



National Provider Identifier

Testimony to the National Committee
on Vital and Health Statistics
Subcommittee on Standards and
Security – January 24, 2007

National Provider Identifier

■ American Dental Association

- The world's oldest and largest dental professional association
- Represents over 153,000 dentists or almost seventy-two percent of the dentists in clinical practice in the United States

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1. What if any issues have our members (or dentists in general) had relative to applying for and using the NPI?
 - *Solo dentist corporations and multi-doctor organizations uncertain whether to apply for individual, organization, or both NPI entity types.*
 - *Paper application confuses many applicants despite the instructions provided with the application form.*
 - *Configuration of NPPES site is confusing to some applicants.*
 - *Unfamiliarity with Provider Taxonomy codes and where to obtain them.*

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1. What if any issues have our members (or dentists in general) had relative to applying for and using the NPI? (Continued)

- *NPI confirmation notices lost or ignored by applicants.*
- *Uncertainty about where or how to use NPIs on paper claim forms.*
- *Outdated billing systems that need expensive hardware and software updates.*
- *Frustration with NPI Enumerator customer service.*

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2. Are there any concerns specific to our members' (or dentistry's) interests?

■ *Implementation Strategy Concerns*

- *Vendor readiness*
- *Trading Partner flexibility*
- *Testing*
- *Dual Use (Legacy ID and NPI) – ADA agrees with WEDI's recommendation for HHS to establish a contingency plan to allow use of legacy identifiers for 12 months after the industry has access to the NPPES data*
- *Transition Plan*

■ *Paper form implications-will the payers require on paper*

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2. Are there any concerns specific to our members' (or dentistry's) interests? (Continued)

■ *Payment Continuity Concerns*

- *Revenue Cycle Management*
- *Payment Monitoring*
- *Error Resolution Plan*

■ *Data Requirements*

- *Payer Crosswalk Solutions – NPI, Legacy ID, Other Data*
- *Taxonomy Code – will taxonomy codes be required on claims*
- *Validation Criteria with the Payers*
- *Availability in Practice Management Systems*

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3. What, if any, education and outreach has the ADA conducted relative to NPI?

■ *8 articles on the NPI in the ADA News:*

- *No need to buy NPI Kits - posted 08/08/2007*
- *How to apply for your NPI - posted 07/11/2006*
- *The national provider identifier - posted 07/11/2006*
- *Its time to apply for a National Provider Identifier - posted 05/09/2006*
- *Doctor, who are you? - posted 06/06/2005*
- *Association launches NPI information campaign - posted 05/23/2005*
- *National provider identifier application process begins May 23 - posted 05/17/2005*
- *Feds set sights on national identifier system for health care providers - posted 02/16/2004*

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3. What, if any, education and outreach has the ADA conducted relative to NPI? (Continued)

- *Brochures and posters were available at the ADA Annual Session in October 2006.*
- *The ADA worked with the National Dental Electronic Data Interchange Council (NDEDIC) for the development of NPI outreach materials aimed at dentists in July and August of 2006 and will be participating with NDEDIC to present a Webinar in February 2007.*

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3. What, if any, education and outreach has the ADA conducted relative to NPI? (Continued)

- Numerous materials on ADA website at www.ada.org/goto/npi
- *Presentations by ADA representatives were given at the HIPAA Summit (April 2006); NDEDIC (May 2006); and the WEDI May and November Annual Conferences.*
- *An ADA representative is a co-chair to the WEDI NPI Outreach Initiative (NPIOI).*
- *In addition, in 2006 the ADA responded to approximately 1200 calls related to the NPI and answered approximately 300 e-mails*

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4. What is our evaluation of dentist readiness to successfully respond to NPI implementation beginning May 23, 2007?

- *Based on information obtained from CMS in early December of last year, 86,400 dentists have applied for their NPI.*
- *The ADA estimates this represents at least 58 percent of all dentists in clinical practice, either full time or part time.*
- *However, using a projection of dentists likely to submit electronic claims in 2006, the ADA estimates the 86,400 could represent as many as 85 percent.*

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- Only a small number of providers have successfully transmitted these numbers means little or no testing to date
- NPPES data not yet available to payers
- Payers unable to crosswalk NPI with legacy IDs
- Significant potential for Adverse Impact on claims payments
- Agree with WEDI recommendation for contingency plan based on access to NPPES data

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